

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	Bankruptcy No. 05-33857-TPA
PATRICK J. CONNOLLY,)	
)	Chapter 13
Debtor,)	
)	
UNITED STATES OF AMERICA,)	
INTERNAL REVENUE SERVICE,)	Hearing Date: June 8, 2006
)	
Movant,)	
)	
v.)	Document No.
)	Related to Document No. 2
PATRICK J. CONNOLLY,)	
)	
Respondent.)	

OBJECTION TO CONFIRMATION
OF CHAPTER 13 PLAN DATED SEPTEMBER 30, 2005

AND NOW, comes the United States of America, by its attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Edward J. Laubach, Jr., Special Assistant to the United States Attorney for said district, and submits these instant objections to the proposed Chapter 13 Plan dated September 30, 2005, filed by the debtor.

1. The Internal Revenue Service has a claim against the above-named debtor in the amount of \$349,470.43, which amount includes secured claims in the amount of \$31,891, unsecured priority claims in the amount of \$69,400.85, and general unsecured claims in the amount of \$248,178.58.

2. The debtor's Chapter 13 Plan proposes to pay the IRS a priority claim of \$3,500.

3. Under Bankruptcy Code § 1322(a)(2), priority tax claimants must be paid in full under a Chapter 13 Plan.

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4. Under Bankruptcy Code § 1325(a)(5), secured tax claimants must retain their liens and receive full payment of their value with interest at the current statutory rate.

5. The debtor's Chapter 13 Plan fails to comply with Bankruptcy Code §§ 1322(a)(2) and 1325(a)(5).

WHEREFORE, it is prayed that confirmation of the debtor's Chapter 13 Plan be denied.

MARY BETH BUCHANAN
United States Attorney

Dated: MAY 25 2006

BY: 
EDWARD J. LAUBACH, JR.
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the U.S. Attorney
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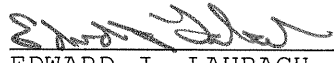
Certificate of Service

This is to certify that I served, or caused to be served, a copy of the foregoing paper by either CM/ECF electronic notification or by first-class, postage prepaid envelope on MAY 25 2006 to the following:

Patrick J. Connolly
151 Limerick Road
Wexford, PA 15090

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CM/ECF Email Service



EDWARD J. LAUBACH, JR.
Special Assistant to
the U.S. Attorney

Dated: MAY 25 2006